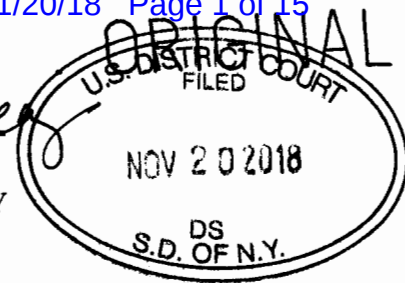


Approved: Jeffrey C. Coffman
 JEFFREY C. COFFMAN
 Assistant United States Attorney



Before: THE HONORABLE HENRY B. PITMAN
 United States Magistrate Judge
 Southern District of New York

18 MAG 9858

COMPLAINT

UNITED STATES OF AMERICA

- v. -

NIKOLAY LEVINSON,

Defendant.

Violations of 18 U.S.C.
 § 876(c)

COUNTY OF OFFENSE:
 NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

RICHARD SCHNEIDER, being duly sworn, deposes and says that he is a Detective with the New York City Police Department ("NYPD") Hate Crimes Task Force, and charges as follows:

COUNT ONE

(Mailing a Threatening Communication)

1. On or about July 2, 2015, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to an individual in New York, New York (Victim-1), and containing a threat to injure, to wit, LEVINSON mailed to Victim-1 a letter containing the text "NIGGERS, JEWS . . . BAD NEWS! [Victim-1's first name redacted], NOW I KNOW WHERE YOU LIVE," and a cartoon drawing depicting a black man pointing a handgun in the direction of a white man wearing a yarmulke and holding a piece of paper bearing the words "NOTICE - RENT HIKE - EFFECTIVE IMMEDIATELY."

(Title 18, United States Code, Section 876(c).)

COUNT TWO
(Mailing a Threatening Communication)

2. On or about July 2, 2015, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to an individual in Brooklyn, New York ("Victim-2"), and containing a threat to injure, to wit, LEVINSON mailed to Victim-2 a letter containing the text "NIGGERS, JEWS . . . BAD NEWS! INV. [Victim-2's last name redacted], WE KNOW WHERE YOU LIVE, BITCH," and a cartoon drawing depicting a black man pointing a handgun in the direction of a white man wearing a yarmulke and holding a piece of paper bearing the words "NOTICE - RENT HIKE - EFFECTIVE IMMEDIATELY."

(Title 18, United States Code, Section 876(c).)

COUNT THREE
(Mailing a Threatening Communication)

3. On or about July 13, 2015, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to an individual in Tappan, New York ("Victim-3"), and containing a threat to injure, to wit, LEVINSON mailed to Victim-3 a letter containing the text "NIGGERS, JEWS . . . BAD NEWS! We know that you're a pig and we know where you live. You took our cocaine shipment years ago and we lost a lot of money. You have no idea what you have done, motherfucker!!! Now it's time to have some fun!!!!!!!!!!!!!!!!!!!!!!," and a cartoon drawing depicting a black man pointing a handgun in the direction of a white man wearing a yarmulke and holding a piece of paper bearing the words "NOTICE - RENT HIKE - EFFECTIVE IMMEDIATELY."

(Title 18, United States Code, Section 876(c).)

COUNT FOUR
(Mailing a Threatening Communication)

4. On or about July 13, 2015, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant,

knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to an individual in Washingtonville, New York ("Victim-4"), and containing a threat to injure, to wit, LEVINSON mailed to Victim-4 a letter containing the text "NIGGERS, JEWS . . . BAD NEWS! We know that you're a pig and we know where you live. You took our cocaine shipment years ago and we lost a lot of money. You have no idea what you have done, motherfucker!!! Now it's time to have some fun!!!!!!!!!!!!!!!!!!!!!!," and a cartoon drawing depicting a black man pointing a handgun in the direction of a white man wearing a yarmulke and holding a piece of paper bearing the words "NOTICE - RENT HIKE - EFFECTIVE IMMEDIATELY."

(Title 18, United States Code, Section 876(c).)

COUNT FIVE
(Mailing a Threatening Communication)

5. On or about August 29, 2017, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to an individual in Waynesboro, Pennsylvania ("Victim-5"), and containing a threat to injure, to wit, LEVINSON mailed to Victim-5 a letter containing an image of horror movie villain Michael Myers holding a large knife in a threatening manner, above the typewritten text: "YOU'RE [sic] FUCKING DEAD BITCH!"

(Title 18, United States Code, Section 876(c).)

COUNT SIX
(Mailing a Threatening Communication)

6. On or about September 26, 2017, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to an individual in Bronx, New York ("Victim-6"), and containing a threat to injure, to wit, LEVINSON mailed to Victim-6 a letter containing a handwritten swastika and the following text: "Dear [Redacted], you locked us

up years ago now you are going to die motherfucker! You will die in your sleep It will be the real blue blood! Death is coming."

(Title 18, United States Code, Section 876(c).)

COUNT SEVEN
(Mailing a Threatening Communication)

7. On or about September 27, 2017, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to Victim-1, in New York, New York, and containing a threat to kidnap and to injure, to wit, LEVINSON mailed to Victim-1 a letter containing an image of the Grim Reaper above the typewritten text: "COME TO WORK AT YOUR OWN RISK MOTHERFUCKER YOU WILL DIE BY GUNFIRE!!!!!!!!!!!!!!!!!!!!!!!!!!!!"

(Title 18, United States Code, Section 876(c).)

COUNT EIGHT
(Mailing a Threatening Communication)

8. On or about September 30, 2017, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to an individual in St. Thomas, Pennsylvania ("Victim-7"), and containing a threat to kidnap and to injure, to wit, LEVINSON mailed to Victim-7 a letter containing an image of the Grim Reaper above the typewritten text: "YOU ARE GOING TO DIE PRETTY SOON, MOTHERFUCKER. YOU WILL BE SHOT TO DEATH AND BLEED LIKE A SICK PUSSY. YOUR DEATH IS INEVITABLE!!!! ENJOY THE REST OF YOUR BREATHS. DEATH IS COMING YOUR WAY, YOUR EYES WILL CLOSE FOREVER!"

(Title 18, United States Code, Section 876(c).)

COUNT NINE
(Mailing a Threatening Communication)

9. On or about September 30, 2017, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to an individual in Brooklyn, New York ("Victim-8"), and containing a threat to kidnap and to injure, to wit, LEVINSON mailed to Victim-8 a letter containing an image of the Grim Reaper above the typewritten text: "YOU ARE GOING TO DIE PRETTY SOON, MOTHERFUCKER. YOU WILL BE SHOT TO DEATH AND BLEED LIKE A SICK PUSSY. YOUR DEATH IS INEVITABLE!!!! ENJOY THE REST OF YOUR BREATHS. DEATH IS COMING YOUR WAY, YOUR EYES WILL CLOSE FOREVER!"

(Title 18, United States Code, Section 876(c).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

10. I am a detective with the NYPD Hate Crimes Task Force, and I have been involved in the investigation of NIKOLAY LEVINSON, the defendant. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement officers, victims, witnesses, and others, as well as my examination of reports, records, and the mailings at issue in this matter. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

11. Since in or about July 2015, the NYPD has been investigating a pattern of threatening letters mailed through the United States Postal Service to persons and entities throughout the United States, including letters sent to and/or from the greater New York City area, including locations in the Southern District of New York. Based on my involvement in this investigation, including my review of the threatening mailings, many of which are in certain respects identical or nearly identical, interviews of several victims of the threatening

mailings conducted by myself and/or other investigators, and my review of documents and information provided to NYPD by victims and other law enforcement agencies, there is probable cause to believe that NIKOLAY LEVINSON, the defendant, sent the threatening mailings described below.

**LEVINSON's July 2, 2015, and
September 27, 2017 Mailings to Victim-1**

12. Based on information and documents provided by Victim-1 and counsel for the modeling agency at which Victim-1 is employed ("Company-1"), I know that:

a. In or about July 2015, Victim-1 received via the U.S. Postal Service a mailing addressed to him at his apartment in New York, New York (the "2015 Mailing to Victim-1"). Its envelope bore a postmark indicating that it had been mailed from New York, New York on July 2, 2015. Inside the envelope was a piece of paper bearing the text "Niggers, Jews . . . Bad News!" and a printed cartoon drawing depicting a black man pointing a handgun in the direction of a white man who is wearing a yarmulke and holding a piece of paper bearing the words "NOTICE - RENT HIKE - EFFECTIVE IMMEDIATELY" (together with the text, the "Threatening Cartoon").¹ Below the Threatening Cartoon was the handwritten text: "[Redacted], NOW I KNOW WHERE YOU LIVE."

b. In or about September 2017, Victim-1 received via the U.S. Postal Service a mailing addressed to him at Company-1's office in New York, New York (the "2017 Mailing to Victim-1"). Its envelope bore a postmark indicating that it had been mailed on or about September 27, 2017. Inside the envelope was a piece of paper containing a picture of a black-robed, skeletal figure carrying a scythe (*i.e.*, the Grim Reaper)² above the typewritten text: "COME TO WORK AT YOUR OWN RISK MOTHERFUCKER YOU WILL DIE BY GUNFIRE!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!"

¹ Threatening mailings sent to Victim-2, Victim-3, and Victim-4 contained copies of the same Threatening Cartoon. See ¶¶ 14, 16, and 18, *infra*.

² Threatening mailings sent to Victim-7 and Victim-8 contained copies of the same Grim Reaper picture. See ¶¶ 26 and 29, *infra*.

13. On or about October 5, 2018, I interviewed Victim-1, who stated in substance and in part, the following:

a. Victim-1 works as an agent at Company-1. Approximately five years ago, Victim-1 hired NIKOLAY LEVINSON, the defendant, as a temporary driver. LEVINSON worked for Victim-1 for approximately one or two days, picking Victim-1 up from his home and office and driving Victim-1 to various places.

b. LEVINSON was very friendly, and did not cause any problems while working for Victim-1. Victim-1 did not know why LEVINSON would send him a threatening letter.

LEVINSON's July 2, 2015 Mailing to Victim-2

14. Based on information and documents provided by Victim-2, I know that in or about July 2015, Victim-2 received via the U.S. Postal Service a mailing addressed to Victim-2 at his home in Brooklyn, New York (the "Mailing to Victim-2"). Its envelope bore a postmark indicating that it had been mailed from New York, New York on July 2, 2015. Inside the envelope was a letter containing the Threatening Cartoon. Below the Threatening Cartoon was the handwritten text: "INV. [redacted], WE KNOW WHERE YOU LIVE, BITCH."

15. On or about October 5, 2018, a NYPD Detective interviewed Victim-2, who stated in substance and in part the following:

a. Victim-2 is a civilian NYPD employee. In 2010 and 2011, Victim-2 was assigned to NYPD's Applicant Processing Division. During this time, on more than one occasion, NIKOLAY LEVINSON, the defendant, applied to become a NYPD Police Officer. LEVINSON was rejected each time he applied. Victim-2 was an investigator assigned to LEVINSON's case.

b. In 2015 Victim-2 received the Mailing to Victim-2 by mail at Victim-2's home address. The letter caused Victim-2 to fear for Victim-2's safety.

LEVINSON's July 13, 2015 Mailing to Victim-3

16. Based on information and documents provided by Victim-3, I know that in or about July 2015, Victim-3 received via the U.S. Postal Service a mailing addressed to Victim-3 at his home in Tappan, New York via (the "Mailing to Victim-3"). Its

envelope bore a postmark indicating that it had been mailed from Daniels, New Jersey on July 13, 2015. Inside the envelope was a letter containing the Threatening Cartoon. Below the Threatening Cartoon was the typewritten text: "We know that you're a pig and we know where you live. You took our cocaine shipment years ago and we lost a lot of money. You have no idea what you have done, motherfucker!!! Now it's time to have some fun!!!!!!!!!!!!!!!!!!!!!!"

17. On or about June 29, 2018, a NYPD Detective interviewed Victim-3, who stated in substance and in part the following:

a. Victim-3 is a NYPD Police Officer. Victim-3 knew NIKOLAY LEVINSON, the defendant, when they were both in high school. Over the years they have played on numerous soccer teams together. Victim-3 always got along with LEVINSON, and does not know of any reason LEVINSON would target him with a threatening letter. However, Victim-3 is aware that, shortly before Victim-3 received the Letter to Victim-3, LEVINSON learned that Victim-3 is a police Officer.

b. In July 2015 Victim-3 received the Mailing to Victim-3 at Victim-3's home address. The letter caused Victim-3 to fear for the safety of Victim-3 and Victim-3's family.

LEVINSON's July 13, 2015 Mailing to Victim-4

18. Based on information and documents provided by Victim-4, I know that in or about July 2015, Victim-4 received via the U.S. Postal Service a mailing addressed to Victim-4 at his home in Washingtonville, New York (the "Mailing to Victim-4"). Its envelope bore a postmark indicating that it had been mailed from Daniels, New Jersey on July 13, 2015. Inside the envelope was a letter identical to the letter sent to Victim-3 on the same date. See ¶ 16, *supra*.

19. On or about July 6, 2018, a NYPD Detective interviewed Victim-4, who stated in substance and in part the following:

a. Victim-4 is a NYPD Detective. In July 2015, the Mailing to Victim-4 arrived by mail at Victim-4's home.

b. A few months before the Mailing to Victim-4 arrived, NIKOLAY LEVINSON, the defendant, engaged Victim-4 in conversation while Victim-4 was using a bank ATM

machine. The two did not know each other at the time. Victim-4 initially participated in the conversation because Victim-4 believed LEVINSON was a fellow law enforcement officer. When Victim-4 learned that LEVINSON was not actually a fellow law enforcement officer, Victim-4 attempted to end the conversation. LEVINSON then stated that he had recently been in a car accident, and requested that Victim-4 assist him in acquiring the accident number. Victim-4 provided LEVINSON his business card and instructed LEVINSON to call Victim-4 when Victim-4 was at work, so that he could assist LEVINSON. A few days later, Victim-4 provided LEVINSON with the accident number and instructions as to how to acquire the accident report. Afterwards, LEVINSON continued to text Victim-4 for a few months. VICTIM-4 did not respond to LEVINSON's texts.

c. After ignoring LEVINSON's texts for a few months, the Mailing to Victim-4 arrived at Victim-4's home. The letter caused Victim-4 a great deal of alarm and fear for the safety of Victim-4 and Victim-4's family.

**LEVINSON's 2014 Mailings to
Maryland Department of Corrections Personnel**

20. Based upon records provided by the Maryland Department of Public Safety & Correctional Services ("MDOC"), Intelligence and Investigative Division, I am aware that:

a. NIKOLAY LEVINSON, the defendant, was employed by MDOC as a corrections officer from on or about February 23, 2010, until he resigned on or about February 20, 2012. During this period, LEVINSON was assigned to the Maryland Reception, Diagnostic and Classification Center ("MRDCC"), located in Baltimore, Maryland.

b. On or about October 21, 2013, NIKOLAY LEVINSON, the defendant, was reinstated and employed by MDOC as a corrections officer. LEVINSON resigned again on or about February 24, 2014. During this period, LEVINSON was assigned to the Maryland Correction Training Center ("MCTC") in Hagerstown, Maryland.

c. From on or about March 25, 2014, through on or about July 30, 2014, approximately 30 MDOC personnel received approximately 50 anonymous letters by United States Mail. The majority of the letters were addressed to MDOC personnel assigned to the MCTC in Hagerstown, Maryland (the "MDOC Letters"). Some of the MDOC Letters were mailed

to MCTC or another MDOC facility. Others were mailed to the homes of MDOC personnel. The envelopes containing the MDOC Letters bore postmarks indicating they had been mailed from locations throughout the United States.

d. The MDOC Letters generally included one or more of the following:

i. Pornographic images of unknown men, usually engaging in sex acts with each other;

ii. Accusations that MDOC personnel were engaging in sexual activity with inmates and/or each other;

iii. Accusations that MDOC personnel were members of the Ku Klux Klan ("KKK"); and/or

iv. Accusations that MDOC personnel and the MCTC facility itself were under federal investigation and would soon be charged/closed.

e. One of the MDOC Letters was mailed to Victim-3 at her home. This letter's postmark indicates that it was mailed on or about May 02, 2014, from Baltimore, Maryland. This letter alleged that a large portion of the officers at "TC" (i.e., MCTC or the Training Center) were known KKK members, and that "the feds" were preparing to fire and indict several of them.

LEVINSON's September 2014 and August 2015 Arrests, 2017 Conviction, and August 2015 through August 2017 Imprisonment

21. Based upon my review of documents and information provided by the Office of the County Prosecutor of Bergen County, New Jersey pertaining to NIKOLAY LEVINSON, the defendant, I am aware of the following:

a. On or about September 29, 2014, following the execution of a search warrant on LEVINSON's residence in Englewood, New Jersey, officers of the Fort Lee Police Department arrested LEVINSON on charges of harassment, in violation of N.J.S. § 2C:33-4, distribution of obscene material, in violation of N.J.S. § 2C:34-2b, bias intimidation, in violation of N.J.S. § 2C:16-1(a)(2), stalking, in violation of N.J.S. § 2C:12-10b, and making false reports to law enforcement, in violation of N.J.S. § 2C:28-4a (the "2014 New Jersey Charges").

b. The 2014 New Jersey charges stemmed from investigations of numerous similar anonymous letters that had been sent to, among others, a police officer ("Police Officer-1") and a teacher at a high school in New Jersey ("Teacher-1") (the "2014 Arrest Letters"). The content of the 2014 Arrest Letters typically included one or more of the following:

i. Pornographic images of unknown men, usually engaging in sex acts with each other;

ii. Allegations that Police Officer-1 and Teacher-1 were engaging in sexual affairs with colleagues, subordinates, students, or arrestees, using illegal drugs, and other misconduct or criminal acts;

iii. Allegations that Police Officer-1's wife had been unfaithful, and had engaged in sexual acts with other police officers;

iv. KKK images;

v. Allegations that Police Officer-1 had made racial and homophobic remarks about civilians; and/or

vi. Threats to harm Police Officer-1's family.

c. During the September 29, 2014 search of LEVINSON's residence, police officers seized, among other things, two inked stamps that were consistent with ink stamps on the envelopes in which many of the 2014 Arrest Letters were mailed, and a letter addressed to a third victim, a retired police officer, the contents of which was identical to the content of one of the letters sent to a fourth victim, a bank employee.

d. LEVINSON was arrested on the 2014 New Jersey charges in or about September 2014, released on bail, rearrested in or about August 2015, and imprisoned until in or about August 2017. On or about August 18, 2017, LEVINSON pleaded guilty to one count of making terroristic threats in the third degree, in violation of New Jersey Code, Title 2C:12-3A, and two counts of stalking in the fourth degree, in violation of New Jersey Code, Title 2C:12-10B, in connection with the letters he mailed to and/or concerning Police Officer-1 and Teacher-1.

LEVINSON's August 29, 2017 Mailing to Victim-5

22. Based on information and documents provided by MDOC, I know that in or about August 2017, Victim-5 received via the U.S. Postal Service a mailing addressed to Victim-5 at her home in Waynesboro, Pennsylvania (the "Mailing to Victim-5"). Its envelope bore a postmark indicating that it had been mailed from New York, New York on August 29, 2017. Inside the envelope was a letter containing a picture of Michael Myers, the murderous villain from the horror movie series "Halloween," holding a large knife. Underneath the picture were the words: "YOU'RE [sic] FUCKING DEAD BITCH!"

23. On or about July 7, 2018, a NYPD Detective interviewed Victim-5, who stated in substance and in part the following:

a. Victim-5 is a MDOC Lieutenant. NIKOLAY LEVINSON, the defendant, was one of Victim-5's subordinates during LEVINSON's time as a corrections officer at the MCTC. LEVINSON was assigned to report to Victim-5 so that she could further train LEVINSON, because his performance as a corrections officer had not been satisfactory. LEVINSON did not perform well under VICTIM-5's supervision. As a result, Victim-5 had been forced to "write him up" on a few occasions.

b. In May 2014 Victim-5 received an anonymous letter at her home. The letter alleged that there were KKK members working at the MCTC. The letter was similar to many other letters received by MDPSCS employees at the time. See ¶¶ 20(d)(iii) and (iv), *supra*. The letters stopped arriving for a period of time beginning in 2015, when LEVINSON was incarcerated in New Jersey.

c. On or about August 29, 2017, Victim-5 received the Mailing to Victim-5 at her home via the U.S. Mail. The Mailing to Victim-5, and the fact that LEVINSON knows where Victim-5 lives, has caused Victim-5 to fear that he will come to her residence and act on his threat.

LEVINSON's September 26, 2017 Mailing to Victim-6

24. Based on information and documents provided by Victim-6, I know that in or about September 2017, Victim-6 received via the U.S. Postal Service a mailing addressed to Victim-6 at his home in Bronx, New York (the "Mailing to Victim-6"). Its envelope bore a postmark indicating that it had been mailed from New York, New York on September 26, 2017. Inside the envelope

was a handwritten letter that read: "DEAR [Redacted], YOU LOCKED US UP YEARS AGO NOW YOU ARE GOING TO DIE MOTHERFUCKER! YOU WILL DIE IN YOUR SLEEP. IT WILL BE THE REAL BLUE BLOOD! DEATH IS COMING." The letter also contained a handwritten swastika.

25. On or about October 9, 2018, a NYPD Detective interviewed Victim-6, who stated in substance and in part the following:

a. Victim-6 is a retired NYPD Detective and current civilian NYPD employee. Victim-6 is also the author of a novel about the NYPD entitled "Blue Blood."

b. In September 2017 Victim-6 received the Mailing to Victim-6 at his home. Victim-6 does not know who sent the Mailing to Victim-6, and believes that the reference to "Blue Blood," likely is a reference to his book.

LEVINSON's September 30, 2017 Mailing to Victim-7

26. Based on information and documents provided by Victim-7, I know that in or about October 2017, Victim-8 received a mailing via the U.S. Postal Service addressed to Victim-8 at his home in St. Thomas, Pennsylvania (the "Mailing to Victim-7"). Its envelope bore a postmark indicating that it had been mailed from New York, New York, on September 30, 2017. Inside the envelope was a letter containing the same picture of the Grim Reaper contained in the 2017 Mailing to Victim-1, see ¶ 12(b), *supra*, above the typewritten text: "YOU ARE GOING TO DIE PRETTY SOON, MOTHERFUCKER. YOU WILL BE SHOT TO DEATH AND BLEED LIKE A SICK PUSSY. YOUR DEATH IS INEVITABLE!!!! ENJOY THE REST OF YOUR BREATHS. DEATH IS COMING YOUR WAY, YOUR EYES WILL CLOSE FOREVER!"

27. On or about July 7, 2018, I interviewed Victim-7, who stated in substance and in part the following:

a. Victim-7 is a corrections officer employed by MDOC. Victim-7 worked at the MCTC with NIKOLAY LEVINSON, the defendant, when LEVINSON was a corrections officer. While they were working together, Victim-7 observed LEVINSON show a pill bottle to a group of inmates. LEVINSON attempted to hide the pill bottle when Victim-7 approached. Victim-7 took the pill bottle to the infirmary to verify the type of pills it contained, and was informed that the pills were not controlled. Nevertheless, Victim-7 reported LEVINSON's conduct to his superiors.

b. In October 2017 Victim-7 received the Mailing to Victim-7 at his home. The letter has caused Victim-7 and his family to fear that LEVINSON will come to his home to act on his threat.

LEVINSON's September 27, 2017 Mailing to the Israeli Consulate and September 30, 2017 Mailing to Victim-8

28. Based on information and documents provided by the Israeli Consulate, I am aware that on or about October 2, 2017, the Israeli Consulate in New York, New York received via the U.S. Postal Service a mailing addressed to the Israeli Consulate (the "Mailing to the Israeli Consulate"). Its envelope bore a postmark indicating that it had been mailed on September 27, 2018. The envelope contained a letter with a printed image of a swastika above typewritten text that read: "MAKE AMERICA GREAT AGAIN!!!!!! JUDEN RAU NEGROES AND FAGGOTS MUST BURN IN HELL CHRISTIAN IDENTITY IS BACK." The handwritten return address on the Mailing to the Israeli Consulate's envelope bore Victim-8's name and work address.

29. Based on information and documents provided by Victim-8, I am aware that in or about October 2017 Victim-8 received via the U.S. Postal Service a mailing addressed to Victim-8 at his home in Brooklyn, New York (the "Mailing to Victim-8"). Its envelope bore a postmark indicating that it had been mailed from New York, New York on September 30, 2017. Inside the envelope was a letter identical to that in the Mailing to Victim-7. See ¶ 26, *supra*.

30. On or about October 26 and 27, 2017, a NYPD Detective interviewed Victim-8, who stated in substance and in part the following:

a. Victim-8 did not send the Mailing to the Israeli Consulate.

b. Earlier that month, Victim-8 had received the Mailing to Victim-8 at his home.

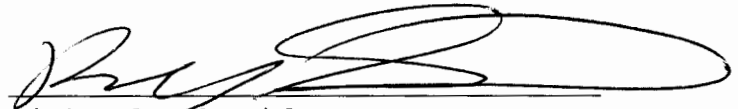
c. Victim-8 and his family immigrated from Uzbekistan to Israel when Victim-8 was seven years old. Victim-8 met NIKOLAY LEVINSON, the defendant, when they were both students in the same fifth grade class in Israel. Victim-8 and LEVINSON socialized together because they were part of a small group of Russian-speaking students at the school. In 1995, when Victim-8 and LEVINSON were in the seventh grade, LEVINSON moved to the United States.

Victim-8 moved to the United States in 1999. Victim-8 saw LEVINSON only twice after arriving in the United States: once in 1999, and once in 2001.

d. In 2012, Victim-8 and people connected to Victim-8 through LinkedIn and Facebook, including his friends and employer, began receiving letters about Victim-8. The letters contained allegations concerning Victim-8's sexual orientation, that Victim-8's wife was cheating on him, and that Victim-8 was cheating on his taxes.

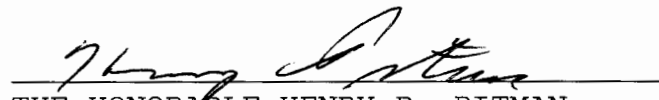
e. In 2015, after Victim-8 learned that NIKOLAY LEVINSON, the defendant, had been imprisoned for sending threatening letters to police officers and others, Victim-8 concluded that LEVINSON had sent the letters to Victim-8's employer and friends. Victim-8 is very concerned for his safety and the safety of his family as a result of the Mailing to Victim-8.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of NIKOLAY LEVINSON, the defendant, and that he be arrested and imprisoned or bailed, as the case may be.



Richard Schneider
Detective
New York City Police Department

Sworn to before me this
20 of November, 2018



THE HONORABLE HENRY B. PITMAN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK